Quatrefoil, Inc.
Design • Landscape Architecture • Space Planning

EFSEC
905 Plum Street SE
Olympia, WA 98504-3172

BPA
Public Affairs Office – DKE-7
P.O. Box 14428
Portland, OR 97293-4428

WR - DEIS
Public Comment #550

RE: Whistling Ridge Energy Project DEIS

Dear Sirs,

I would like to express concerns about the proposed Whistling Ridge Energy Project's potential impacts on the National Scenic Area and in particular the Historic Columbia River Highway (HCRH), a district listed in the National Register of Historic Places.

I have been working with OPRD and ODOT on the restoration of Mitchell Point for several years and in particular the design of several overlooks to be located along the HCRH State Trail. I am concerned that the existing analysis does not adequately address this section of the HCRH Key viewing area. This area is due south of the proposed project and within the Special Management Area of the CRGNSA.

The HCRH is a linear scenic and historic resource in Oregon, extending from Troutdale to The Dalles. All of the HCRH is a Key Viewing Area within the Columbia River Gorge National Scenic Area (CRGNSA). Portions of the HCRH that are a trail are designated as a National Recreational Trail. Portions of the HCRH are closer to the proposed project than the sites chosen for visual resource analysis.

The Mitchell Point overlook is more visually sensitive than Interstate 84, both because it is higher in elevation and because it is a place where people stop and get out of their cars to take photos. It is closer to the proposed project than Viento State Park, Koberg Beach State Park and the Hood River to Mosier section of the Historic Columbia River Highway State Trail that were analyzed. This site should be analyzed for visual impact from the proposed project.

Thank you for the opportunity to comment on this DEIS.

Sincerely,

Brian E. Bainnson, ASLA
President, Quatrefoil, Inc

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WR - DEIS
Public Comment #551

RECEIVED
AUG 31 2010
ENERGY FACILITY SITE
EVALUATION COUNCIL

August 26, 2010

Washington EFSEC
905 Plum Street SE
Olympia, WA 98504-3172

RE: DEIS for the Whistling Ridge Energy Project, proposed in the Underwood, WA area, along the Skamania and Klickitat county lines.

Dear EFSEC,

This proposal is likely to have different and greater wildlife impacts than any other wind energy facility proposed in the State of Washington, because it is proposed along a forested ridgeline in the foothills of the Cascade Mountains. The proposed project would cause significant negative impacts to sensitive wildlife and plant habitat, and would degrade the outstanding scenic beauty of the Lewis and Clark National Historic Trail and Columbia River Gorge National Scenic Area.

I am concerned that the DEIS is fundamentally flawed because it fails to provide a fair and balanced alternative analysis. EFSEC and BPA need to consider other alternatives, including other means of providing electricity (including increasing efficiency and reducing consumption), other sites for wind energy, other configurations, deleting turbines to reduce impacts, alternative routes for hauling turbines to avoid traffic impacts to the National Scenic Area, etc. Only two alternatives are meaningfully considered in the DEIS (the proposal and the no-action alternative). This is inadequate.

The DEIS has other flaws. The DEIS fails to adequately analyze the potential cumulative impacts of this project when considered with other existing and likely future wind energy projects and other development projects in the region. The photo simulations in the DEIS are inadequate and misleading. Some of them have cloudy backgrounds, thus not adequately representing the full extent of the impacts, and other simulations are out scale. Additional viewpoints need to be considered, including views from the Historic Columbia River Highway. The DEIS erroneously concludes that the scenic impacts would not be significant, even though most of the turbines would be visible from designated key viewing areas within the National Scenic Area. In addition he BPA and EFSEC have not adequately consulted with the Yakama Indian Nation to ensure the protection of cultural resources.

As the Gorge Commission has recently held EFSEC must determine if this project would require any road construction or ground-disturbing activities in the National Scenic Area.

In addition to these concerns above I am worried about the impact to human health due to turbine noise and light flicker.

Lastly, EFSEC and BPA need to fix the flaws in the DEIS and issue a revised or supplemental DEIS, and make substantial revisions to the EIS to fully inform the public about the true environmental impacts of the project. If another DEIS is issued the 50-turbine layout should be rejected.

Thank you for extending the public comment period and allowing me to submit these comments into the record.

Sincerely,

Kate McCarthy

Kate McCarthy
9095 Cooper Spur Rd.
Mt. Hood, OR 97041

Confederated Tribes and Bands of the Yakama Nation
Established by the Treaty of June 9, 1855

Post Office Box 151
Toppenish Washington 98948

Washington EFSEC
905 Plum Street S.E.
Olympia, WA 98504-3172

8-26-2010

RE: Whistling Ridge Energy Project DEIS

Thank you for providing an additional opportunity for comment regarding the Whistling Ridge Energy Project Draft Environmental Impact Statement (DEIS). The Whistling Ridge Energy Project is located within the Ceded Lands of the Yakama Nation, the legal rights to which were established by the Treaty of 1855, between the Yakama Nation and the United States Government. The Treaty set forth that the Yakama Nation shall retain rights to resources upon these lands and, therefore, it is with the assistance and backing of the United States Federal Government that Yakama Nation claims authority to protect traditional resources. Yakama Nation's comments are provided by the Cultural Resources Program (CRP) of the Yakama Nation, established by Tribal Resolution T-66-84 as an arm of the Tribal Government. Comments are respectfully submitted by those whom the Tribal Government has designated to speak on behalf of the Yakama Nation regarding the protection of cultural resources in this matter.

A Yakama Nation Traditional Cultural Property (TCP) has been identified within project boundaries on Chemawa Hill, the proposed location of turbines A1-A7. At this time, the Yakama Nation Tribal Council is meeting to discuss potential impacts, proper treatment, and recommendations regarding the TCP. These recommendations of the Tribal Council will be available by mid-September.

A report identifying the presence of a TCP on Chemawa Hill was provided to the applicant by Yakama Nation CRP in December 2009. However, despite the availability of that information to the applicant, discussion regarding impacts to the TCP were omitted from the DEIS. This omission is highly concerning. The applicant has, on numerous occasions, suggested a willingness to work with Yakama Nation, however, the omission of this important information from the DEIS, does not currently indicate a willingness to consider the Tribe's concerns.

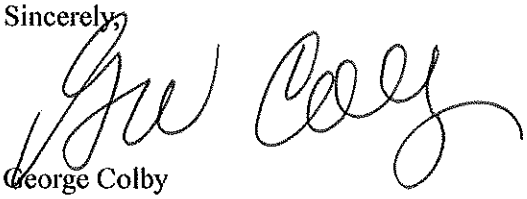
Yakama Nation CRP was not the only agency to express concerns regarding construction of wind turbines on Chemawa Hill. Several other organizations and agencies stated similar concerns and were also omitted from the DEIS. The Skamania County Agri-Tourism Association asked that the "A Towers" be re-sited; the USDI National Park Service recommended removing the A1-A7 turbines to alleviate negative visual impacts; Friends of the Columbia Gorge identified sensitive viewsheds that would be affected by the proposal, and the USDA Forest Service Columbia River Gorge National Scenic Area expressed concerns about visual impacts of the project from key viewing areas of the National Scenic Area.

Additional comments not fully considered under the DEIS included comments from agencies such as the Washington State Department of Fish and Wildlife, which expressed concerns about impacts to bats and birds, and the Attorney General of Washington Counsel for the Environment, who requested analysis of plant and animal species and habitats. Further comments regarding impacts to the natural and cultural environment included the Washington Department of Archaeology and Historic Preservation, which discussed the TCP identified by the Yakama Nation among other topics; The Seattle Audubon Society, which brought attention to Northern Spotted owls and other avian species; Friends of the Columbia Gorge, which discussed threatened and sensitive animal species, and Save Our Scenic Areas who provided comments regarding a number of important environmental concerns.

Given the above listed omissions, the Yakama Nation does not believe that the current information provided in the DEIS has adequately analyzed the environmental impacts associated with development of a wind facility at the proposed location. Furthermore, placement of turbines on Chemawa Hill must be addressed and analyzed with the fair consideration of all concerns submitted through this process. Among the concerns identified, Yakama Nation has notified the applicant and EFSEC of the presence of a Yakama Nation TCP on Chemawa Hill. As mentioned above, this issue is currently before the Yakama Nation Tribal Council and a decision regarding the appropriate treatment of this site will be forthcoming.

The protection of traditional resources within the Ceded Lands of the Yakama Nation is of utmost importance to CRP and the Tribal Government, which it represents. Diminishing habitat caused by development has greatly increased the scarcity of traditional plant and animal resources, as well as diminished access to and altered traditionally important places. Continued and unchecked development will immeasurably harm the traditional resources enjoyed by tribal members if a true and careful analysis of impacts and alternatives is not practiced.

Sincerely,



George Colby
Attorney for the Executive Committee
Yakama Nation Tribal Council
On Behalf of the Yakama Nation Cultural Resources Program
P.O. Box 6
Toppenish, WA 98948

August 26, 2010
882 Thuja Narrow
Washougal, Washington 98671-7406

Washington Energy Facility Site Evaluation Council
905 Plum Street
Olympia, Washington 98504-3172

Re: Whistling Ridge Energy Project May 2010 Draft Environmental Impact Statement

Members of the Council:

Thank you for extending the deadline for comments. Although it arrived at the very last minute, it was a generous extension and I hope that you will also extend the time you will take to review what I imagine will be the many additional submissions.

For the following reasons, as well as those that others have taken the time to bring to your attention, I strongly feel that a completely revised document must be created to stand as an accurate and unbiased presentation of information that Council members can use to make an informed decision regarding this proposal.

The existing document shows a lack of professionalism in many important areas that is inappropriate to both the SEPA/NEPA requirements and the process, as well as to the scale and potential impact of the proposal upon the region and its varied resources. Following are a few of the things that I find the most disturbing. Thank you for considering them when the Draft document is revised.

Section 1, 1.1, Pg 1 Para. 2 Interconnection and **Section 1, 2.2 Pg 4 BPA Purpose and Need for Action** I do not believe that BPA has yet responded to the request for interconnection. The nearby BPA transmission lines are at carrying capacity with a backlog of other requests for interconnection. Although the location is referred to in Section3, the precise location for the proposed Whistling Ridge Project interconnection is presently unknown, since no new transmission line has yet been constructed, nor has firm commitment from BPA to existing lines been granted. This renders the cumulative impacts assessment incomplete. It is also incomplete with respect to several other facets of this proposal as well. The BPA new line access corridor construction and interconnection costs, design and placement of any collector substation and interconnection structure, as well as an evaluation of the resulting environmental impacts of their construction and operation would be legitimate, mandatory elements for inclusion in this document.

Since BPA is partially responsible for the DEIS document, it should not be problematic for the agency to include an open and clearly understandable discussion of the agency's present interconnection problems as they relate to the current proposal, thus clarifying this aspect of the EIS. There is discussion of possibilities that were considered but rejected, however, the option finally chosen appears to be questionable, especially since BPA has offered no firm commitment.

Section 1, 2.3.2 Pg 6 ".....it is critical to locate projects in areas where transmission lines currently exist. The applicant thus needs to locate near existing high-voltage transmission , such as the FCRTS." As noted above (in Section 1, 2.2 notes), the currently existing BPA transmission line is running at capacity, with no possibility for the addition of large additional sources, such as this project's proposed output would comprise.

The critical issue regarding wind facilities is indeed appropriate siting, but not for the reason of proximity to transmission lines. The applicant (I assume this is the author) misunderstands the basic premise and need for an environmental impact statement. The lack of transparency regarding this issue is disturbing, and should be clarified in the BPA discussion of the issue, rendering this claim invalid. It should be removed from the document; it appears repeatedly in all Sections.

Section 1, 2.3.3 Pg 6 Business Needs of the Applicant An EIS is not a branch of any chamber of commerce nor is an EIS a forum for advertisement. The history of the applicant/company is already included in the Appendices. Other local background information is included in Section 3, 3.10.2.1 Historic Background and this is where it belongs. Every company has business needs but this is not the arena for such discussion. This heading and its text should be removed.

Section 1, 3.2 Pg 7 "The EIS will be used primarily to inform...." As it stands, I do not feel this document yet contains the essential information needed for informed, responsible decision-making, especially in the areas of wildlife impacts, soils/geology and cumulative impacts analysis. It must be improved significantly before it can serve its intended purpose. This may take more time, but it will certainly ensure that the final EIS is a more suitable document for unbiased decision-making, which at this point it is not.

Section 1, 3.3 and 4 Pgs 8, 9 NEPA Section 102 (2) (c) requires that alternatives to the proposed action be provided. There are **no** Action Alternatives offered in this document (the No Action Alternative is not considered a viable alternative.) Alternatives must be presented and discussed as real possibilities, not avoided by stating that alternatives were "considered but eliminated from detailed study" as is stated in Section 1, 4.3. The Applicant cannot choose to avoid this requirement. Although it is stated several times that the document "... is intended to fulfill the format and content requirements " of a joint SEPA/NEPA EIS, it falls well short in many areas.

Section 1, 4.1 Pg 9 Proposed Action The project site is stated to have a "proven, robust wind resource." There is no material to supply this "proof in the EIS document. If "robust " is interpreted to mean "good", then this statement is doubly inaccurate. The web-based National Renewable Energy Lab regional wind power mapping resource states that the proposal area provides only "marginal to fair" averaged wind resources compared to other sites in the state. The good to excellent areas are farther east. A BPA (among others)-sponsored wind mapping project on the Internet shows the area to have not particularly good wind resources as well.
The wind mapping data, referenced above, conflicts with the applicant's claim that the project site has a "'proven, robust wind resource." No scientifically stringent data is presented that supplies this "proof." This "proven, robust" ("steady") terminology appears repeatedly throughout the document and is misleading. A credible document needs to show at least an attempt at accuracy and objectivity.

There are other reasons as well, discussed on the following pages, that indicate the selected site may be a poor choice for a wind facility. Paramount to these, is the technical geologic study of the project site that has not yet, and must be been performed before suitability evaluations begin.

One of the factors that the Applicant used to identify site suitability was stated to be the "associated lack of native habitat, reducing or eliminating the need to clear additional forest land." Section 3 discusses the initial "need to clear trees to prepare ridge top sites for construction of turbine base pads and of specially configured parts delivery roadways. Information is even provided regarding where the logs will be taken after being cut. The applicant needs to choose one statement or the other and ensure that references to the eliminated statement are removed from the document as well. Which will it be? A credible document displays consistency.

A current aerial photograph of the steep (70% or more) southern side of the project area, in the vicinity of proposed turbine string A1 – A7 shows standing trees that were restricted from being cut by Washington State DNR when the applicant applied for a Forest Practices Application permit in 2003. What were the constraints that prevented this harvest? Will project approval permit the cutting of these trees, in order to clear for turbine pads and access roads, overriding the earlier DNR prohibition? The Council would need to investigate the nature of the DNR constraint before the evaluation process proceeds.

Again, mention of the alleged availability of nearby BPA transmission lines as a site selection factor: transmission lines that do not have the capacity to carry significant additional power. This issue needs to be clarified as discussed under " **Interconnection**" on pages one and two.

Lastly, the site was stated to have been chosen because it is close to an SDS mill site (even though it was stated above that no additional trees would have to be cut for the project) and to SDS business offices! Surely this declaration could be deleted lest it be concluded that convenience has a higher value than environmental factors when choosing a suitable location for a wind power facility. Perhaps if the reasoning behind the statement was elucidated, it might seem an appropriate inclusion.

Section 1, 4.1.2 states that a trench, approximately 8.5 miles long and 5 feet wide would be required to place collector cables. The DEIS mentions reseeding with of grasses and native plants, but does not mention what species, nor whether trees or shrubs that were removed would be replaced in-kind. If the plantings are to minimize noxious weed colonization would the reseeding areas be watered to ensure germination in time to counteract opportunistic germination of undesirable species? If so, the amounts used should appear in the Section 3 water use list and a watering regieme presented.

Will the removed soil be compacted as it is returned to the trench? Will the soil returned to the trench be returned in the same order that it was removed? What will the compaction guidelines entail? Who ensures that it is done properly? Since this extensive trench will likely disturb underground water flow patterns and create new, possibly undesirable flow patterns, it may be important to consider imposing certain requirements and ensuring that agency inspectors with authority to enforce , not proponents or contractors, oversee the work.

Section 1, 4.2 Pg 12 No Action Alternative To state that the No Action Alternative "would not help the state of Washington in achieving the renewable energy goals mandated by the state's Renewable Portfolio Standard" is misleading. Washington State wishes to encourage renewable energy, but not to the exclusion of all else. Site selection is probably the most important way that negative environmental consequences can be avoided, especially with respect to wildlife. Moreover, BPA does not segregate power sources. Once it is produced and fed into the collection system, it is dealt with as any business commodity, in this case by bids. Much of the power we create here is used elsewhere, historically, to California. To imply that a rejection would flout state goals and policies is simplistic and a little misleading.

"(The No Action Alternative) would help to meet the region's need for additional power in the coming years." If by "region", "local" is meant, our regions need is not great. The Columbia River, and other water-driven power-generating dams continue to supply more than ¾ of our power needs. The current trend is to improve efficiency and to encourage both business and the private sector to conservation. It has been estimated (Draft Sixth NPP, 2009) that almost 80% of our locality's future energy demands can be met in this way. Existing and newly approved wind facilities in the region, with a focus in Klikitat County, are more than adequate to make up the difference. It would be not only misleading but inaccurate to state or imply that there is a "need" for additional wind power in this portion of the Northwest.

Section 1, 4.3 Pg 13 Alternatives Considered but Eliminated from Detailed Study The applicant's response is in violation of the guidelines by virtue of not complying with the requirement to supply Alternatives. As mentioned above, an EIS requires that alternatives be provided and considered, with accompanying data and analysis to match all of the other Action Alternatives presented.

Section 1, 4.3.1 Pg 13 Alternative Project Locations The contents of this portion are redundant. Again, it avoids the EIS requirement regarding Alternatives. The points made here have all been stated previously (Section 1, 4.1), in the same bulleted form and with almost the same wording.

Section 1, Table 1 Pg 22 Earth: Construction: Design and Mitigation Measures All of the Design and Mitigation Measures listed are "would be" statements. They "should be" already part of the EIS! If, for instance there was a critical subsurface condition, it needs to be known and factored into the decision process, not "discovered" after approval. Only in this way can accurate and responsible evaluation occur. Because of the difficult terrain, there would appear to be very little possibility for adjustment, should geologic constraints be revealed initially. This could easily endanger the viability of the project, which underscores the importance of having data collected from rigorous studies, and analysis conducted by respected sources. Even with the added benefit of such information, the impacts of such radical alterations to a fragile topography can only be guessed. Stringent geologic study of the proposed site must be performed now and the results reported in another, hopefully improved Draft document. This information will be essential for the Council's evaluation. Without it, the process will have no merit.

Section 1, Table 1 Pg 22 Earth: Construction and Operation – The considerable alterations to the terrain that are proposed for this project - 8.5 miles of three to four foot deep, five foot wide trenches for cable burial, 30-foot deep turbine pads that will require leveling with machinery and extensive blasting to excavate, the building of adequate access and delivery roadways on steep slopes - will certainly have more impacts, and ones that influence each other more closely, than

those listed. The changes made to accommodate the towers will forever alter the ridge tops and they will not revert to their pre-construction profiles after the project is decommissioned. It is inaccurate as well as disingenuous to state that the project construction requirements would be "minor to moderate."

Why is volcanic ash deposition of such concern that it is mentioned here? Granted, several of the soils present do contain a volcanic ash component, but it is not clear to me why this appears, since there is no control over the possible event and, depending on the severity of an ash fall, no mitigation measures would be possible. Large amounts of ash could be physically removed, but would that be mitigation?

Does the statement regarding mass wasting " No obvious recent mass wasting features" imply that there is evidence of the phenomena having occurred on the site in the not-so- recent past? If so, then this is another reason why a more thorough geologic assessment be conducted, **before** the project is evaluated by the Council.

Although the soil type present on part of the project site has low liquefaction potential, massive excavation and refill, as in the 8.5 mile trench , may disturb soil structure enough to render the possibility greater than in the undisturbed state. Although liquefaction of soils are generally associated with earthquake activity, a similar phenomenon may result when soils become over-saturated. As mentioned above, there is no doubt that the proposed excavated and refilled trench will impact and redirect existing subsoil water flows for 8.5 or more miles and may potentially influence an area far greater than the area of the trench. It is also possible that drainage may be improved in the trench after refill, but the possibility that it will not, must be at least considered.

Section 1, Table 1 Pg 22 Water: Construction and **Operation** On-site development will certainly impact ground and surface water drainage patterns as indicated above. It is well- recognized that new roadbeds alter water flow significantly and are responsible for a good deal of continuing erosive runoff. The replacement of natural soil and rock drainage on the site with impervious concrete pads constitute large surface areas that will prohibit slow drainage. Water will be quickly released from these surfaces in large quantities at approximately the same time, limiting the remaining soil's ability to absorb and release it slowly. Some of the remaining soil may be additionally compacted from heavy construction machinery, limiting even more its ability to absorb rainfall and melting snow slowly.

Section 3 downplays the impact these impervious surfaces may have upon soils, but this need to be seriously examined. Each of the 49 tower pads have a diameter of 60 feet, creating 2920 square feet of impervious surfaces at the top of steep ridges. , These conditions produce fast runoff accompanied by high erosion which, over time may lead to catastrophic geologic events, as well as degrade waterways used by fish, amphibians and invertebrates. Amend this inaccurate denial of the project's impacts to ground and surface waters. A discussion, or at the very least a mention of the runoff potential should be presented, as well as possible impacts to the larger streambeds below, with potential to impact fish, amphibians and invertebrates, upon which fish depend for food. Larger game and non-game animals may be impacted as well through water quality degradation and the possible inability to even reach water. The standard BMP guidelines will not be adequate for this anticipated situation. In recognition of this, an individual plan to accommodate the special runoff problems of the project could be developed as part of a mitigation plan, implemented and monitored by an agent other than the applicant/contractors, if

the project is approved. The cumulative impacts discussion should deal with this possibility as well, but does not.

Section 1, Table 1 Pg 24 Biological Resources: Construction Soil compaction is an undesirable and irreversible impact that should be acknowleged since it affects soil drainage, the ability of certain plants to grow well and limits the species of plants that will grow.

In addition to "loss of suitable habitat," abandonment of adjacent suitable habitat due to construction activity should be considered a likely possibility. Some bird, mammal and invertebrate species are known to be more sensitive to intrusive activities, including noise, than others. Several of these species are listed as being present in the project area. Add "abandonment of suitable habitat due to construction activity" to the list on page 24.

Section 1, Table 1 Pg 24 Biological Resources: Operation "There would be some mortality to birds and bats due to turbine collision and displacement, though not in sufficient numbers to affect population viability." I restrain myself when I say that this statement is offensively inaccurate. It also reveals the applicant's misunderstanding of the "cumulative impact" concept. As wind farms proliferate in our region, the cumulative mortalities become increasingly significant for individual populations, regardless of their population status.

Just because there have been no studies addressing bird population declines in association with wind installations does not mean that one has a legitimate claim to deny that such a relationship may exist.

The bat studies cited, employed equipment that was not capable of determining the bat species e present. How then, can an assessment of a particular population be made? Or, by extension, a statement regarding population viability? What authority provided the status information for each population? What is the source of data for western bat species population size? Eastern bat species are being threatened with mass extinctions from White Nose Syndrome, the etiology and causative organism of which is still unknown. The disease has not yet reached the western states; because of this, it is essential that ALL western bat populations be given added protection, regardless of their population status. The bat study data is inadequate in certain respects; the study plan assumptions were not adequately rigorous, there were discrepancies in data collection procedures from year to year, making comparisons and data merging ineffective; long-term sampling frequency was sparse. At the very least, a repeat survey should be conducted which would identify bat species.

The Columbia River Flyway is a major East to West migration route that has likely been used longer than mankind has been here. Raptors are known to use mountain ridges for North/South travel as well as for hunting in this part of the Columbia River. People come from many places outside of this area specifically to see the variety of birds that congregate and fly through this river corridor, some stopping to feed for a few days or weeks before moving on. This site would be an unconscionable choice for a development of this kind, with this knowledge.
"No impacts to listed species" – is this a wish, or a promise from an unknown deity? How can it possibly be known ahead of time that a listed species will not be impacted; especially when inadequate studies have failed to identify what species use the area and with what frequency? And when only a two year start-up mortality study is planned? This is not enough time to obtain meaningful data much less to make any conclusions from the data. The project location would be

an especially difficult one for such monitoring due to the terrain and planned forestry understory management activities. A recent eastern U. S. mortality study is employing dogs to find bat carcasses, because they are so difficult to locate by eye, even in dry flat grassland.

There is no body of information available documenting how wild animals might respond to the sound of wind turbine propellers. This should be at least briefly discussed and dealt with as a possible impact.

Section 1, Table 1 Pg 24 Biological Resources: Design and Mitigation Measures "In order to avoid or minimize impacts to any raptors potentially nesting on or near the project site, a raptor nest survey would be conducted ....." Then what? A survey is not a mitigation measure.

The composition of the proposed Technical Advisory Committee members is not well thought out. Entities or personages that have vested interests or have demonstrated no interest, cannot be relied upon to make responsible, nor to make informed mitigation recommendations. To include the developer on such a committee would be unwise as well as unfair to the resources. If this route is pursued, enforcement capabilities must be granted and there must be a preponderance of resource advocates as committee members. TAC groups are by reputation, generally ineffective when they have no powers. They are also rendered ineffective if members have conflicts in interest, as counties and developers often do. This would be a great opportunity to cast aside TACs, breaking out of the customary mold and devising a new and more effective way to resolve monitoring and mitigation issues associated with such a project.

"For potential impacts to big game species (deer and elk) coordination with WDFW will occur if appropriate." Again, just to mention something does not comprise a mitigation measure. What about bears, and large cats? Who decides if a situation is "appropriate" warranting consultation? Under what circumstances would it be appropriate to coordinate? The project location is a designated wintering area for elk. What plant species are present that elk might use for winter forage? Will these species be replanted and therefore present in adequate quantities to continue to serve as winter forage during construction and operation of the proposed project? These considerations must be treated responsibly somewhere in the document. The quoted statement is vague and obtuse. It leaves the reader with **no information** about how big game species ' use of the area will be approached, nor does it correct nor solve any problems big game species may have because of the project.

Section 1, Table 1 Pg 25 Energy and Natural Resources: Operation The "Minor quantities of lubricating oils....." should be specifically quantified, if only as an estimate, to be consistent with the remaining listed items.

Section 1, Table 1 Pg 25 Environmental health: Construction The project is located at the southern end of a wide contiguous band of lands termed "Fire-prone Landscape Management Strategy Area" by a USFWS 2008 Final Spotted Owl Recovery Plan map. This area runs from the Columbia River north to the Washington-Canada border. The increased risk of fire during the summer months must be seriously considered and aggressive prevention measures **above the usual standards** should be pursued and stipulated.

Prohibitions on conducting potential spark and fire-generating activities during the driest fire danger periods of the year could be part of a plan keyed to this project and would demonstrate

care and concern for nearby communities. A several month delay in certain construction activities and equipment use as a result of time-of-year prohibitions would be well justified and need not halt all building progress.

There WILL be blasting activity in association with this project, if approved. Getting rid of the "may" and "could" in the bullet dealing with blasting would be a more honest way of stating the realities of the massive environmental reshaping that this project will engender. If "Blasting could also create a fire hazard during dry weather", then this activity should be curtailed during these periods. Likewise, an activities plan related to the regional weather patterns might suggest avoiding blasting during unusually wet times of the year to avoid problems similar to those encountered recently along Hwy 14. There is no doubt that the level of blasting activity alone has the potential to seriously destabilize this particular environment, which, as noted elsewhere, already has nearby unstable loci. Since there is no geologic assessment data provided, it is impossible to even guess what impacts such activity could produce. When the geologic assessment is conducted, it should address not only immediate impacts but the potential long-term impacts of blasting, even although this would only be predictive. Road department records from Underwood and Hwy 14 should give the Council a good idea of the areas' historic instability.

Section 1, Table 1 Pg 25 Environmental health: Construction (Column 4} The second, bulleted statement in column 4 implies that a fossil-fuel- powered facility might supply fill-in power when a wind facility is unproductive (and that it would carry a higher risk of fire.) There is a federal requirement mandating that alternative power source facilities must accompany any new wind facility, based upon the amount of power generated. The proposed wind project would generate above the MW threshold, requiring the construction of an alternative power-generating facility to balance a wind farm's unproductive periods of no wind or too high wind. The construction cost of this requirement building, inter-tie costs, should certainly be included in the cost analysis for this project, but it does not appear. Since the alternative power facility is a requirement , its location should be identified and the associated environmental impacts need to be included in the EIS, including the cumulative impacts portion.

Section 1, Table 1 Pg 26 Environmental Health: Operation Again, with respect to fire potential, local ordinances and other regulations and standards are not directed to such a project, and are not adequate, because of the unusual situation. An individually tailored, aggressive fire prevention plan and response tactic needs to be developed for the construction and operation phases of this proposed project. Relying on existing regulations will not adequately address the specific potential hazards nor protect the nearby population and environment.

"...none of the planned turbines are within 2,500 feet of existing residences." This is not correct; there is one residence. Mitigation measures should be included in the proper column.

"EMF from the project ...would have no health and safety impacts." I do not see any information in the document to support this assertion. There is certainly study regarding the issue, but conclusions are not definitive at this time. Can a pronouncement be made if there is inadequate documentation? Unless this can be produced, this statement needs to be removed or qualified in some manner in order to be objective.

Section 1, Table 1 Pg 27 Noise: Construction This section downplays construction noise, which will carry well into the valleys and bounce off of adjacent hillsides. Although construction is stated to occur during daylight hours, it will likely begin very early and continue through dusk.

The added noise of myriad transportation trucks will certainly impact local residents on a daily basis and should be included in the list.

The noise from blasting will certainly be noticeable and will last for awhile. In thoroughness, it should also be mentioned.

Section 1, Table 1 Pg 27 Noise: Operation An in-depth submission regarding wind turbine noise impacts upon humans has been submitted. Please consider it as a counter to the data presented in the EIS and take appropriate action to modify the table.

Section 1, Table 1 Pg 33 Socioeconomics: Operation There are several studies that identify undesirable affects of turbines upon humans (see K. Brown's testimony citations). One would not unreasonably conclude that properties in close proximity to such turbine arrays might be less desirable for habitation, at least to a percentage of the population. Proponents of wind power have issued statements derived from studies indicating that property values are not adversely affected by nearby wind turbines. As such studies continue, depending on the analyses, certainly there is the possibility that property values may be affected one way or another, but for now either position can support and document its claims.

Section 1, 7 Pg 34 Summary of Unavoidable Adverse Impacts : Earth The enormously disruptive activity that will be required to complete this project, located in a geologically fragile environment that has already been subjected to considerable alteration, is very likely to respond with undesirable events. In potentially susceptible areas, no amount of "careful design" can prevent, nor can "mitigation measures" restore, areas where mass wasting has occurred. It should be added to the list of potential adverse impacts, especially since evidence of such an event was documented during a previous survey. The severe re-contouring, blasting, large-scale trenching and creation of impervious surfaces all increase the likelihood of minor or major responses from the environment. The soil types in some areas are acknowledged to be susceptible to erosion and the proposed "A" array is located precisely along a Class II (High Landslide Hazard Area) ridgeline. To dismiss these and other known geologic concerns with the two brief dismissive statements presented is unacceptable. Until a reputable geologic assessment study is performed, there will remain a glaring gap in this arena. Without professional scientific data, any predictive statements can only be considered arbitrary and of dubious merit.

Section 1, 7 Pg 34 Summary of Unavoidable Adverse Impacts: Air Quality Construction activity would involve many more pieces of diesel-fueled machinery than any logging operation. It is absurd to think that the residents of the town of Underwood will not notice, nor be affected by, a continuing stream of diesel trucks heading up and down the roads every day for months. Peak morning hour numbers of trucks are estimated to be 210/hr for 3-5 months. Further, all major construction equipment is to be diesel-powered (Section3 Table 6-5, Pg 109 Fire and Explosion Risk Mitigation.) It is disingenuous to claim that this would be comparable to "existing logging operations.", and equally so to state that "the project would contribute to a beneficial impact on overall air quality" Climatological data presented in the EIS indicates that the area is prone to air stagnation at all times of the year, but especially during the summer when pollutants from downriver may collect forming considerable haze. Even if this statement refers to the completed project, it is a bit of a stretch to claim "beneficial impacts on overall air quality" when the requirement to build alternative fuel power plants are a direct result of building wind powered

facilities. With this in mind, it might be fairer to consider that project would lead to a decline in overall air quality.

Section 1, 7 Pg 34 Summary of Unavoidable Adverse Impacts: Biological Resources See previous comments regarding bats and birds (Section 1, Table 1 Biological Resources: Operation.) The Summary statement simply reiterates the document text statements, almost word for word, imparting the same inappropriate lack of concern. Why are no other wildlife groups mentioned? Certainly animal corridors will be interrupted, the areas in which young are raised may be pushed further away and populations may become fragmented. Even with the proposed mitigation measures in place, erosion runoff would affect the fishery and invertebrate communities downhill of this project. Blasting may obliterate pika or marmot populations that may have been overlooked. No mention of them occurs in the animal surveys. These could be significant impacts unless there is some oversight to ensure that mitigation measures are maintained to the standard for the duration of construction. Often, self-policing measures produce initial compliance, but over time may be seen to deteriorate.

Section 1, 8.2 Para 1 Pg 37 The last sentence in this paragraph appears to more of a running prepositional phrase. It is awkward and could be recast for a more professional presentation.

Section 1, 8.2 Para 2 Pg 37 The first sentence of the second paragraph is incomplete and needs structural as well as subjective clarification.

The last sentence of this paragraph still stretches my imagination – how will "introducing up to 75 MW" of wind power "contribute to efforts to improve air quality in the Columbia River Gorge vicinity?" If anything, fossil-fuel facilities will be **added** (producing a negative effect upon air quality) to make up for the irregular output of this wind facility.

Section 1, 10 Pg 38 References Again, BPA's Wind Integration Plan might be an excellent addition to the references section if it might clarify the line access and interconnection issues.

Section 2, 1.4.1 Pg 9 Construction Activities "Transportation of construction materials" (gravel, concrete, rebar, etc.) could be added to the list but "Use of dynamite and machine re-contouring of ridges" should be added to the list.

Section 2, 1.4.2 Pg 12 Construction Schedule Earlier portions of the document state a construction time of one year. This section states "approximately 15 months" would be required for construction ; all other sections repeatedly mention one year. Consistency throughout the document would enhance credibility. Are the construction cost estimates based upon 12 or "approximately 15 months?" The suggested time-of-year prohibitions to pro-actively address fire danger could be inserted into the detailed construction schedule, possibly changing the time frame even beyond 15 months.

Section 2, 1.4.4 Pg 13 Construction Costs An extra three months or more added to the construction time estimate of one year stated early in the EIS will add to the construction cost estimate presented in Section 2, 1.4.4 Pg 13, assuming that it is based upon a 12-month time frame.

Another cost that has not been discussed, although it may not be considered a bona fide construction cost, is that of the required alternative/fossil fuel facility that would make up for non-production times at the wind facility. Interconnection, substation and line link costs associated with this facility should be also be added and later considered in cumulative impact analyses. The total cost of building an alternative power supply facility to offset erratic wind generation is possibly not the responsibility of the applicant, but possibly some monetary responsibility exists? Who pays for the construction of such a facility? Is the cost partially subsidized? If so, by whom?

Section 2, 1.5 Pg. 14 Project Operations The project is stated to "operate 24 hours per day, seven days per week," implying that generation also occurs on that schedule. It might be a bit more objective to modify the statement to reflect the reality of wind power generation for those who do not know.

Is there any capability
The first U. S. study of reduced (bat) fatalities and economic costs of "low-wind mitigation" began in 2008,continued in 2009 and 2010. The research is being conducted in Pennsylvania with Casselman turbines and has demonstrated that bat fatalities were reduced an average 73% when turbines were left off-line, at night, during low wind conditions (<11.2 – 14.5 mph). An additional benefit to bats was to use the nighttime limitation during the migration season in the fall. The second year of the study, 2009, was funded wholly by USFWS. I will provide the Council with the citations. The calculated loss of production resulting from the temporary stoppage in that area of the country was 0.3 to 1.0% of the facilities' yearly output.

Some studies have indicated that certain individual towers in an array produce more mortalities than others. Will this project have the capability of shutting down a single turbine? Will it be possible to shut down individual arrays in this project? Will the strategy above be a possibility for these turbines or is their operation wholly automatic? What would the cost difference be if this capability was part of the design plan for these proposed turbines? This approach might be one that could be applied to bird mortality as well.

Section 2, 3 Pg 19 Alternatives Considered but Eliminated from Detailed Study As in Section 1, the applicant has substituted a list of self-generated criteria instead of fulfilling the mandated subject matter identified in the heading.

Section 3, 44.1.5 Special Status Wildlife Species Northern Spotted Owl Although the two historical northern spotted owl nesting sites at Moss and Mill Creeks, near the northern boundary of the proposed project are not believed to be presently occupied, these areas still carry the potential for occupation and use. Little is known about long-term northern spotted owl reoccupation patterns and current agency attempts to halt population declines are not encouraging. Forested habitats that have supported northern spotted owls in the past are likely to support a diverse suite of life forms and hold the potential to support one another, given enough space.

The proposed project is located within one of Washington States ten designated SOSEAs (Spotted Owl Special Emphasis Areas.) Although the project location and proposed construction activities do not impinge upon the parameters specified in the state regulations regarding SOSEAs, a favorable decision for this proposal would lead to extensive re-contouring and dynamiting the

outer boundary of a select habitat resource. Regardless of the legality of the proposed actions, to actually go ahead with the proposed habitat alterations would seem to flout the intent of the regulation. Eliminating the northern portion of the B array and the entire C5 to C8 array might allow the outer edges of the historic nest range that overlap the project boundary some protection as well as respect the spirit of the SOSEA. This might even serve as one of the as-yet-unsupplied Action Alternatives.

It is interesting and disturbing at the same time, to see the large list of of bird and mammal species observed at the proposal site and to realize that a number of them are "threatened," federal species of concern, or Washington State candidates for listing. Townsend's big-eared bat is both a federal species of concern and a Washington State Candidate for listing, although the incomplete bat studies conducted at the proposal site did not determine bats to species, it is a possibility that this bat may be using the area as well as Keen's Myotis, another Washington State Candidate for listing.

Although it is acknowleged in **Section 3, page 81** that "Some bat fatalities are anticipated as a result of the operation of the proposed project" the only mention of bats in **Section 3, 4.3 Mitigation Measures** is to minimize turbine lighting "thereby reducing the potential for birds and bats to be disoriented by lights....." Bats are not attracted nor disoriented by lights, although they are attracted by some night-flying insects that are. Essentially then, there is no mitigation measure directed toward bat mortalities; should there not be one suggested? If one cannot be suggested then it is assumed that the proposed project's bat mortalities will have to be considered unavoidable.

On the next page, **Section 3, 4.4 Unavoidable Adverse Impacts,** the second paragraph states that bird and bat mortalities will occur, but that "the level of mortality is not anticipated to be sufficient to negatively affect the population viability of any single species." This fallacy of this statement has been discussed before (page 5); the Applicant has presented no credible documentation to support such a claim. As wind farms proliferate in our region, cumulative mortalities become increasingly significant for individual populations, regardless of their population status. In this case, since population status is an unknown, it would not be possible to make a statement about viability.

Section 3, 4.4 Unavoidable Adverse Impacts, Paragraph three "It appears unlikely that the project would cause any mortality to a threatened or endangered species." Northern goshawks, golden and bald eagles were reported to be present at the proposed turbine sites. This project has an operating time estimate of 30 years. Even a non-statistician might consider the" likelihood" of such an event over thirty years to be at least "somewhat likely." Death can occur from a rare visitation, as well as from frequent visitations and although the number of mortalities may be small, the cumulative impacts for certain bird and bat species could affect overall species survival.

Section 3, 5.2.1 Pg 89 Impacts: Proposed Action: Construction There is no mention of re-using the material removed from blasting in order to lessen the need for 100,000 yards of gravel the project is expected to require. Is this a possibility?

Section 3, 5.4 Pg 92 Unavoidable Adverse Impacts The proposal is stated to have "minor unavoidable adverse impacts to energy and natural resources." The crushed rock requirement by

itself (100,000 yards) would deplete local supplies and possibly drive prices higher locally after construction since it might have to be hauled from greater distances.

The preceeding statement is immediately followed by another, claiming that "The overall impact of the project to energy and natural resources would be positive since it would provide the region with low-cost, clean, renewable energy..." etc. This has been commented on previously. The power generated from the proposed facility will not necessarily be used in this region due to the nature of BPA's power brokering activities. Our region's power costs in the past were indeed comparatively inexpensive, but prices are not low now, nor will they be in the future. P.U.D. newsletters have been explaining this fact to customers for several years. There is a growing discussion about making power costs equal across the country, so that those living in "power-poor "areas will not be unfairly penalized. Clean? Not as clean as solar, and certainly this proposal will require radical environmental destruction.

Section 3 14.3 Pg 269 Cumulative Impacts Rhetoric, political pressure, or private interest should never be allowed to override thorough and thoughtful, unhurried evaluation. Scientific rigor is essential to the cumulative impacts analysis. I am very sorry to see this section displaying an alarming number of mis-statements as well as faulty logic. Some of these statements have been carried over from Sections one and two, but there are several statements introduced in Section 3, clearly meant to justify the EIS's approach to the cumulative impacts analysis, that are simply a result of poor logic and misapplication of conclusions or data that has been taken out of context.

One example is a statement that appears on page 274 of Section 3, and is partially quoted below. The NAS Mid-Atlantic Highlands study conducted in 2007, only three years ago is not as relevant (in 2010)for analysis of cumulative impacts to wildlife, especially birds and bats; the rapid pace of wind power development has changed the dynamic entirely not only in the location of the study but especially in the northwest, making this study unsuitable for cumulative impact use in this EIS. This study moreover, quoted in the EIS in **Section 3, Pg 2, 74 Bird and Bat Species** (last sentence in paragraph 2), concluded that "for rare and local populations" the predicted level of fatalities when combined with all other man-made sources of mortality could affect population viability." This statement was made three years ago. Note that the study referred to predictions of mortality, not documented mortalities per se. It has been found that predictions in the arena of wind power mortalities have often been underestimated.

The "other man-made sources of mortality," contrary to the opening statement in paragraph three **(Section 3, Pg 274 Bird and Bat Species)** is hardly an "inherent difficulty" to a cumulative impacts analysis focusing on wind turbine mortalities. The "other man-made mortalities" are merely ancillary; they existed before wind turbine facilities and comprise a background level inherent to our cultural lifestyle. The "cumulative" aspect of the bird and bat analysis attempts to determine what impact wind turbines have regionally, to sometimes unknown population numbers of migrating, foraging and, nesting species.

State protections, USFWS and other specific, reputable wildlife data also must be considered in the analysis, as should a comparison analysis of costs. Although it is difficult to attribute monetary values to wildlife resources, standards are available to do so.

An essential element in any study is the study plan. Basic assumptions must be scientifically (logically) rigorous and the data collection schedules equally well-planned in order to produce

meaningful results. Data collection on wildlife takes many years. Conclusions from the results of such studies must employ scientific rigor. This is where peer-reviewed papers and respected sources can assist reviewers. To ensure adequately broad and equitable cumulative impacts analysis for this proposed project, it would be appropriate to engage another analyst, other than those that have already provided information and conclusions in association with this proposal. There are well-respected scientists available who would be able to perform this service with expertise and lack of bias. I strongly recommend this action, and the inclusion of such a consultation in the final EIS document.

I have made my points along the way, as I followed through the EIS document and will not summarize my concerns. I realize that this may be an inconvenient way to deal with such a large amount of material, but this is page 14 already! The specific shortcomings of the cumulative impacts section are noted throughout this letter but my main concern is for the apparent lack of understanding about what it should be, and to the lack of critical logic used to justify some of the conclusions.

Thank you for the opportunity to comment further and for considering my comments.

Sincerely,

Sallie Tucker Jones

Michelle, Kayce (UTC)

From: sallie tucker jones [sallietucker4@gmail.com]
Sent: Friday, August 27, 2010 3:24 PM
To: EFSEC (UTC)
Subject: Whistling Ridge Draft EIS Comments
Attachments: August 15 comments re Wind farm.docx

Hi Tammy, I hope this works. Thanks for your help, Sallie

WR - DEIS
Public Comment #554

Michelle, Kayce (UTC)

From: Talburt, Tammy (UTC)
Sent: Friday, August 27, 2010 3:47 PM
To: EFSEC (UTC)
Subject: FW: Comments on Whistling Ridge DEIS

Kayce here is another comment.

Tammy

From: Montano,Andrew M - KEC-4 [mailto:ammontano@bpa.gov]
Sent: Friday, August 27, 2010 3:41 PM
To: 'Glen Holmberg'
Cc: Posner, Stephen (COM); Talburt, Tammy (UTC)
Subject: RE: Comments on Whistling Ridge DEIS

Your comment has been received. Thank you for your interest in the Whistling Ridge Energy Project.

Updates can be found at www.bpa.gov/go/whistling. I'm CCing the Washington Energy Facility Siting and Evaluation Council as well.

Andrew M. Montaño
Bonneville Power Administration | Environmental Protection Specialist
ammontano@bpa.gov | P: 503. 230. 4145 | F: 503. 230. 5699
Pleasure in the job puts perfection in the work. -Aristotle

From: Glen Holmberg [mailto:glenholmy@yahoo.com]
Sent: Friday, August 27, 2010 3:36 PM
To: Montano,Andrew M - KEC-4
Subject: Comments on Whistling Ridge DEIS

To: **The Bonneville Power Administration (BPA) and the State of Washington Energy Facility Site Evaluation Council (EFSEC)**
Re: **The Whistling Ridge Energy Project's Draft Environmental Impact Statement (DEIS)**

I am writing to say the conclusions reached by the authors of the DEIS are wrong. It needs to be redone to reflect reality. I oppose the location of this project and think it's a bad idea for the vast majority of people who live in the area.
The DEIS wrongly concludes that visual impacts will be low to moderate. Page 3-171 describes the north facing view from Hood River Hospital, an urban setting in the middle of town, but fails to describe the impact to any of the viewpoints along the waterfront, residences in town

and recreation areas scattered throughout Hood River and The Gorge. These viewpoints are cherished and attract tourists and residents alike to the area. Industrial wind turbines 400' high will have a high impact on the scenic quality of these view sites, not a low impact.

The DEIS also fails to mention the impact on property values in the area. I own a home in Underwood. I would not consider buying there again if large wind turbines are near by. To conclude that wind turbines will promote eco-tourism is wishful thinking at best.
I request that you reject this DEIS and not allow the project to continue in its current form. The impact it will have on tourism and residents will far outweigh any benefits. A handful of jobs created in Skamania County will not offset the long-term losses to economic growth in The Gorge. We already get 49% of our power from renewable energy. There are much better places to put wind turbines than the edge of a national scenic area.
Glen Holmberg
Underwood WA 98651

BEFORE THE STATE OF WASHINGTON ENERGY FACILITY SITE EVALUATION COUNCIL (WEFSEC)

In the Matter of Application

No. 2009-1

Whistling Ridge Energy LLC

Whistling Ridge Energy Project

Comments by Barbara Bleakley, a private citizen

My husband and I live in White Salmon, WA. We, like thousands of other families, have purchased homes in this area because of the "protected" beauty of the National Scenic Area (NSA). It should continue to be protected as a priceless asset to the NW and our country. It is time for our government to stop supporting any project that is politically expedient at the expense of the citizens. We are hopeful that reason will prevail and that the powers that be perform a careful and thorough analysis of every single possible negative impact to our local communities and environment by this project.

We have grave concerns over locating the Whistling Ridge wind farm on the proposed ridge immediately outside the NSA, including but not limited to the points made below. We can easily conclude that there are better locations in unpopulated or otherwise unproductive areas, and that other more appropriate green technologies should be considered a higher priority.

1. **Precedent.** We feel that if Whistling Ridge is allowed to move forward, the Governor of WA would be setting a dangerous precedent here in the Columbia River Gorge. What will stop other wind farms from being allowed just outside the geographical boundaries but visually impacting the NSA? We have already sacrificed the natural beauty of the Columbia Hills east of the NSA to hundreds and perhaps even thousands of wind turbines on both sides of the Columbia in the interest of this green energy that must be subsidized to make ANY economic sense. How far should we go with this philosophy of creating green energy. At what cost? As common sense tells us, if it sounds too good to be true, it probably is, as evidenced by the ethanol political boondoggle. Allowing this project is outrageous considering all the blood, sweat and tears expended over the creation and management of the nation's ONLY National Scenic Area. Hundreds of millions of dollars of residential view property will immediately be impacted and devalued. Our scenic resources should NOT be held for ransom under the guise of "green energy" without definitive studies of the many significantly adverse impacts to people, wildlife, transportation, management of our electrical grid and its capacity, and our nation's and state's limited monetary resources. How could anyone have ever anticipated that when the NSA act was created by Congress that the most politically powerful family in the Gorge would many years later propose siting a huge industrial wind farm over 400 feet above a ridge immediately outside the boundary lines of the NSA and in plain view of their own White Salmon, Hood River, and Skamania County neighbors?

2. **Inadequate Electrical Grid**. An article published in the Oregonian Newspaper dated July 17, 2010 written by Ted Sickenger titled, "Too Much of a Good Thing: Growth in wind power makes life difficult for grid managers"

(http://www.oregonlive.com/business/index.ssf/2010/07/too_much_of_a_good_thing_growt.html) provides a great summary of the enormous limitations of the current grid system for handling the CURRENT number of wind turbines. It is a very complicated issue that needs to be rectified BEFORE we decide which green energy makes the most sense to invest government dollars in. Why are we spending huge amounts of subsidy money to build what will most likely be an obsolete technology by the time the electrical grid can handle the capacity of these giant wind turbines so they do not have to sit idle when the wind is blowing! There are promising new wind energy technologies under development right now that will very soon be economically viable without subsidies and have less visual and environmental impact. (See http://www.makanipower.com/ for example.)

3. **"Facts".** The promoters of this project have concentrated their money and power on a sales job based on selective misinformation in an attempt to promote the economic and political benefits (which have been grossly exaggerated) to Skamania and Klickitat Counties and WA State. Photos and "facts" have been specifically chosen or rejected to distort the realities as well as to quote old studies that are no longer appropriate. For example, there is a blatant omission (and highly selective inclusions) in the Draft EIS document of any photos of potential visual impacts from the Strawberry Mountain area in White Salmon. How about from the Mark O. Hatfield State Park scenic hike/bike trail along the Columbia River between Hood River and Mosier?

4. **Transportation Studies**. Now that the Oregon Court of Appeals recently upheld the Gorge Commission's right to approve the Broughton Mill development project, new transportation studies should be incorporated in the EIS to address the impact of these two Stevenson family projects, perhaps concurrent, on transportation.

5. **Wildlife Concerns**. There are wildlife concerns that need further study and have been addressed by other opponents to this project. I'm not a biologist, but the impacts on just bat populations by wind turbines has been sited by the USGS in this article: http://www.fort.usgs.gov/batswindmills/. " Dead bats are turning up beneath wind turbines all over the world. Bat fatalities have now been documented at nearly every wind facility in North America where adequate surveys for bats have been conducted, and several of these sites are estimated to cause the deaths of thousands of bats per year. This unanticipated and unprecedented problem for bats has moved to the forefront of conservation and management efforts directed toward this poorly understood group of mammals." These affects on bats and the other 300 species of birds in the Gorge, migratory birds, and other wildlife should be studied further before blindly accepting the notion that wind turbines are "green". Obviously this point isn't limited to just the Whistling Ridge project, but is relevant to all current technology wind farms including this one.

6. **Light pollution**. Visualize a peaceful summer evening enjoying the sunset view of the Gorge from Strawberry Mountain in White Salmon where we live (and from many other areas in the Gorge), and seeing 50 blinking red lights all going off at once as the sun goes down behind them! One of the big draws to rural areas is the beauty of the night sky devoid of city lights.

We hope you will conclude as we have that this is the absolute wrong location for this project, and probably the wrong technology for this time. Please let's use some good old NW common sense that we are known for. Rely on facts and not just somebody's sales pitch, political pressure, and the enticement

of big "free" subsidies, going into private pockets paid for by all US citizens. Please recommend the denial of this project in its proposed location to Governor Gregoire. It is the right decision.

Michelle, Kayce (UTC)

From: Kent and Barbara Bleakley [bkb@gorge.ne
Sent: Friday, August 27, 2010 3:48 PM
To: EFSEC (UTC)
Subject: Whistling Ridge Energy Project
Attachments: Whistling Ridge Comments.doc

Attached are comments on the proposed project for your review.

Thanks,
Barbara Bleakley

LATE WR - DEIS
Public Comment #556

Michelle, Kayce (UTC)

From: Toby McElravey [tmcelravey@hotmail.com]
Sent: Wednesday, September 01, 2010 11:42 PM
To: EFSEC (UTC)
Subject: Whistling Ridge Negatively Impacts Columbia Gorge

I am writing to comment on the DEIS for the Whistling Ridge Energy Project, proposed in the Underwood, WA area, near the Skamania and Klickitat county lines..

This proposal is likely to have different and greater wildlife impacts than any other wind energy facility proposed in the State of Washington, because it is proposed along a forested ridgeline in the foothills of the Cascade Mountains and on the boundary of the Columbia River Gorge National Scenic Area. The proposed project would cause significant negative impacts to sensitive wildlife and plant habitat, and would degrade the outstanding scenic beauty of the Lewis and Clark National Historic Trail and Columbia River Gorge National Scenic Area.

I am concerned that the DEIS is fundamentally flawed because it fails to provide a credible alternatives analysis. EFSEC and BPA need to consider other alternatives, including other means of providing electricity (including increasing efficiency and reducing consumption), other sites for wind energy, other configurations, deleting turbines to reduce impacts, alternative routes for hauling turbines to avoid traffic impacts to the National Scenic Area, etc. Only two alternatives are meaningfully considered in the DEIS (the proposal and the no-action alternative). This is inadequate.

The DEIS has other flaws. The DEIS fails to adequately analyze the potential cumulative impacts of this project when considered with other existing and likely future wind energy projects and other development projects in the region. The photo simulations in the DEIS are inadequate and misleading. Some of them have cloudy backgrounds, thus not adequately representing the full extent of the impacts, and other simulations are out scale. Additional viewpoints need to be considered, including views from the Historic Columbia River Highway. The DEIS erroneously concludes that the scenic impacts would not be significant, even though most of the turbines would be visible from designated key viewing areas within the National Scenic Area. In addition, the BPA and EFSEC have not adequately consulted with the Yakama Nation to ensure the protection of cultural resources.

Lastly, EFSEC and BPA need to fix the flaws in the DEIS, issue a revised or supplemental DEIS, and make substantial revisions to the EIS to fully inform the public about the true environmental impacts of the project. If another DEIS is issued the 50-turbine layout should be rejected.

Thank you for extending the public comment period and allowing me to submit these comments into the record.

Toby McElravey
1595 Nw 138th Ave.
portland, OR 97229